Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Dinell Clark

Title: Staff Director

REQUEST: AT&T Communications of New England, Set #5

DATED: May 17, 2001

ITEM: ATT 5-4 Referring to Part CA Exhibit Page 1 of 2 and Part CA Workpaper 5.0,

please provide actual invoices for Verizon DC power plant installations in Massachusetts to support the following investment elements contained in Verizon's cost study (provide documentation for each of the Metro,

Urban, Suburban and Rural zones):

a) Microprocessor Plant

- b) Rectifiers
- c) Batteries
- d) Automatic Breaker
- e) Power Distribution Service Cabinet
- f) Emergency Engine

REPLY: Please see the 6 attachments to this response. Verizon MA considers this

information to be proprietary and confidential and will provide this information to parties subject to the terms of a mutually acceptable

Protective Agreement.

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce F. Meacham

Title: Senior Specialist

REQUEST: AT&T Communications of New England, Inc., Set #13

DATED: May 31, 2001

ITEM: ATT 13-1 For each UNE for which Verizon seeks to set NRC rates in this docket, please indicate whether or not that UNE can presently be ordered electronically by CLECs.

- (a) For each UNE for which electronic ordering is not available today, please indicate if the forward looking adjustment in the Verizon NRCM assumes electronic ordering in the future.
- (b) For each UNE for which electronic ordering is not available today and for which electronic ordering is not considered in the forward looking adjustment, please fully explain why.

Where the cost of modifying systems to allow electronic ordering is part of any explanation provided in response to the previous question, please provide any and all estimates, quotes from consultants or vendors, and/or opinions from Verizon employees regarding the actual or estimated cost of the modifications necessary to allow electronic ordering.

REPLY:

Please see the attachment which identifies the UNEs for which Verizon seeks to set NRC rates in this docket that can presently be ordered electronically by CLECs. It should be noted that electronic ordering capabilities do not mean complete flow through. As explained in Mr. Meacham's testimony (pg. 14), orders for multiple lines, as well as orders for partial service conversion and orders requiring design work will not flow through even though they may be ordered electronically. In addition orders placed electronically may also fall out for all the reasons Verizon MA provided in its response to Information Request AT&T 13-2.

REPLY: ATT 13-1 (cont'd)

- (a) Please see the attachment to identify each UNE for which electronic ordering is not available today, but for which the forward looking adjustment in the Verizon NRCM assumes electronic ordering in the future.
- (b) Please see the attachment to identify each UNE for which electronic ordering is not available today and for which electronic ordering is not considered in the forward looking adjustment.

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce F. Meacham

Title: Senior Specialist

REQUEST: AT&T Communications of New England, Inc., Set #13

DATED: May 31, 2001

ITEM: ATT 13-3 Please explain why the Verizon NRCM applies TISOC Task #1 to

hotcut orders instead of applying TISOC Task #2.

REPLY: There are basically three types of Local Service Requests ("LSRs")

that can come into the TISOC from CLECS:

- Requests for new or hotcut service

- Requests for an account (e.g., Feature) change to an existing service

- Requests to change a service order that was already submitted (Supplemental) but has not yet been completed

Activity #1 involves the manual labor to process *initial* requests for either new or hotcut service orders. Activity #2 involves the manual labor to process requests for changes to *existing* CLEC customer

service or accounts.

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Bruce F. Meacham

Title: Senior Specialist

REQUEST: AT&T Communications of New England, Inc., Set #13

DATED: May 31, 2001

ITEM: ATT 13-4 Please explain why the Verizon NRCM applies TISOC Task #2 to a

"Two Wire Analog-Dig UNE-P New Initial?"

REPLY: Activity #2 would cover work done to benefit a CLEC end-user

customer who has requested a change to an existing Two Wire Analog-Dig UNE-P New Initial service, such as adding additional features or

listings.

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi

Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #14

DATED: May 31, 2001

ITEM: ATT 14-37 Provide an estimate (by wire center or density zone, if available) of the

percentage of house and riser cable in the Verizon-MA service territory

actually owned by Verizon-MA.

REPLY: Verizon MA objects to this request on the grounds that it is overly

broad and would require a burdensome extensive study, and not

reasonably calculated to lead to admissive evidence.

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Set #19

DATED: June 19, 2001

ITEM: ATT 19-1

Provide the total . recurring and non-recurring charges proposed in the instant proceeding and a detailed listing of all the individual component recurring and non-recurring charges that make up the total charges for each of the following scenarios. In each of the scenarios listed, AT&T wishes to purchase unbundled horizontal cable, unbundled riser cable, or unbundled horizontal and riser cable from Verizon-MA, for use in multiple tenant units ("MTUs"). For simplicity, assume in each scenario that AT&T is ordering UNEs in the Metro region. Please provide specific page and line, and/or column references to Verizon-MA's cost study . where the proposed component charges for each scenario can be found. Also, Indicate whether any additional charges apply which are not contained in the instant cost study but currently exist in Verizon's tariff. For charges contained in both the existing tariff and the Verizon-MA cost study, please provide and cite, in the manner described above, both charges indicating which is drawn from the tariff and which from the cost study. For charges contained in either the Verizon-MA cost study or the existing tariff but not contained in both, please provide and cite, in the manner described above, each charge indicating whether its source is the existing tariff or the Verizon-MA cost study.

- (a) For each scenario in (a), assume that AT&T will be performing all its own cross connections and testing and that the MTU is twelve stories in height but AT&T's customer is located on the tenth story.
 - 1) AT&T purchases only unbundled horizontal cable from

-2-

(cont'd)

Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user, <u>i.e.</u>, AT&T does not use Verizon's riser cable.

- 2) AT&T purchases unbundled riser cable from Verizon-MA, including all connections, equipment and facilities.

 Assume that the horizontal cable is not owned by Verizon.
- 3) AT&T purchases both unbundled horizontal and riser cable from Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user.
- (b) For each scenario in (b), assume that Verizon-MA performs all required cross connections and testing for AT&T and that the MTU is twelve stories in height but AT&T's customer is located on the tenth story.
 - 1) AT&T purchases only unbundled horizontal cable from Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user, <u>i.e.</u>, AT&T does not use Verizon's riser cable.
 - AT&T purchases unbundled riser cable from Verizon-MA, including all connections, equipment and facilities.
 Assume the horizontal cable is not owned by Verizon.
 - 3) AT&T purchases both unbundled horizontal and riser cable from Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user.

REPLY: See attached.